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U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X

1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101



REPLY TO
ATTN OF: Mail Stop 613
CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 26, 1984

Mr. George Drexler
Federal Penitentiary
3600 Guard Road
Lompoc, CA 93435

Re: RCRA Case No. X83-04-01-3008
X83-04-02-3008

Dear Mr. Drexler:

Enclosed please find a set of Interrogatories relating to the above-referenced matter.

As the instructions state, you should answer the Interrogatories, in the space provided (if additional space is necessary, use separate sheets of paper and attach to the Interrogatories), sign and swear to the truthfulness of your responses before a Notary Public, and return the completed Interrogatories to me in the enclosed self-addressed envelope within 30 days of the date of service of these Interrogatories upon you.

Your cooperation in this matter is essential, if you do not respond to these Interrogatories, EPA will move for the issuance of a default Order in the case in which you are a named Respondent.

Sincerely,

Barbara J. Lither
Assistant Regional Counsel

Enclosure

cc (w/encl):

A. N. Foss

cc (w/ encl):

Thomas Yost, ALJ

USEPA RCRA



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8 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 10
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10 In the Matter of:)

11 ARRCOM, INC., DREXLER)
12 ENTERPRISES, INC, et al.,)
13 TACOMA, WASHINGTON,)
RATHDRUM, IDAHO.)

EPA Files No. X83-04-01-3008/
X83-04-02-3008

COMPLAINANTS INTERROGATORIES
TO RESPONDENT

14
15 To: GEORGE DREXLER

16 In accordance with the Consolidated Rules of Practice, 40 Code of
17 Federal Regulations, Part 22, specifically section 22.19(b), and Order by
18 Administrative Law Judge Thomas B. Yost dated August 6, 1984, you are directed
19 to answer the following interrogatories fully, and under oath, within thirty
20 (30) days of the date of service of these interrogatories upon you. Use
21 separate sheets of paper if necessary.

22 These interrogatories are meant to include information within your
23 personal knowledge. Where the facts set forth in your answers are based upon
24 information and belief, as opposed to personal knowledge, then you should so
25 state, specifically identifying the source of your information and belief.
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1 When your answers have been completed, have them verified by
2 completing and signing the enclosed form before a notary public, and
3 return one copy of the interrogatories and verification to this office in
4 the enclosed self-addressed envelope.

5 THE ANSWERS YOU PROVIDE TO THESE INTERROGATORIES ARE TO BE
6 TREATED AS CONTINUING. IF ADDITIONAL INFORMATION IS DISCOVERED BETWEEN
7 THE TIME OF MAKING THESE ANSWERS AND THE TIME OF HEARING, YOU SHOULD
8 PROVIDE SUCH INFORMATION TO EPA. IF SUCH INFORMATION IS NOT PROVIDED, OR
9 IF THE INFORMATION YOU PROVIDE IS INCOMPLETE EPA, AT THE TIME OF HEARING
10 WILL MOVE FOR THE ISSUANCE OF A DEFAULT ORDER AGAINST YOU.

11 As used in the following interrogatories, the following defined
12 terms shall have the meanings herein ascribed to them:

13 (a) "Document" shall mean, without limitation, the following
14 items, whether printed or recorded or reproduced by any other mechanical
15 process, or written or produced by hand: agreements, communications,
16 state and federal governmental hearings and reports, correspondence,
17 telegrams, memoranda of oral conferences, memoranda of conversations,
18 memoranda of meetings, memoranda of telephone calls, interview reports or
19 records, interview notes, diaries, graphs, reports, notebooks, note
20 charts, plans, drawings, sketches, maps, summaries or records of meetings
21 or conferences, summaries or reports of investigations or negotiations,
22 opinions or reports of consultants, photographs, motion picture film,
23 brochures, pamphlets, press releases, drafts, letters, any marginal
24 comments appearing on any document, minutes and all transcriptions or
25 other memorialization of oral conversations or reproductions by any means
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1 thereof, together with all drafts of any written document, and all other
2 documentary material of any nature whether written printed, typed, recorded
3 or other graphic matter, however produced or reproduced from whatever source
4 obtained and whether or not prepared by defendants. "Document" also includes
5 and shall refer to originals and all non-identical copies except that copies
6 which differ by reason of notations made thereon are not considered identical
7 copies.

8 (b) "Person" shall mean any individual, government agency,
9 governing body, officer, employee or agent thereof.

10 (c) "Identify" or "identification" when used in reference to an
11 individual person shall mean to state his or her full name, address, and
12 his or her present or last known position and business affiliation, and,
13 when used in reference to a document means to state the type of document
14 (e.g., letter, memoranda, notes, etc.) or some other means of identifying
15 it as well as its date, and its present location or custodian and the
16 date received. If such document was but is no longer in your possession,
17 custody or subject to your control, state what disposition was made of it.

18 (d) By the use of the pronoun "you", it is intended that the
19 answers are to include all information known to the persons to whom the
20 interrogatories are directed, their officers and employees, agents,
21 attorneys and investigators.

22 In answering each interrogatory, you are hereby required to
23 provide the following information:
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1 (i) Identify by date, sender, recipient, location and custodian
2 each document relied upon or which forms a basis for the answer given or
3 which corroborates the answer given or the substance of what is given in
4 answer to these interrogatories;

5 (ii) State whether the information furnished is within the personal
6 knowledge of the person answering and, if not, the name, if known, or each
7 person to whom the information is a matter of personal knowledge; and

8 (iii) State the full name, occupation, present address and
9 telephone number of each person who assisted or participated in preparing
10 and/or supplying any of the information given in answer to or relied upon
11 in preparing the answers to each interrogatory;

12 (iv) If you maintain that any document which refers to or relates
13 to anything about which these interrogatories ask has been destroyed, set
14 forth the content of said document, the location of any copies of said
15 document, the date of such destruction and the name of the person who
16 ordered or authorized such destruction.

17 DATED this 06 day of September, 1984.

18
19 JAMES R. MOORE
20 Regional Counsel

21
22 By: Barbara J. Lither
23 BARBARA J. LITHER
24 Assistant Regional Counsel
25 U.S. Environmental Protection Agency
26 Region 10
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1 In the Matter of:)
2 ARRCOM, INC., DREXLER)
3 ENTERPRISES, INC., et al.,)
4 TACOMA, WASHINGTON,)
5 RATHDRUM, IDAHO.)
_____)

EPA Files No. X83-04-01-3008/
X83-04-02-3008

VERIFICATION

6 State of California)
7 County of) ss.
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9 _____, being first duly sworn upon oath,
10 deposes and says:

11 He is one of the named Respondents in this proceeding; he has
12 read the foregoing interrogatories and answers thereto, knows the contents
13 thereof, and believes the same to be true.
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15 _____
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18 SUBSCRIBED AND SWORN to before me this ____ day of _____,
19 1984.

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21 NOTARY PUBLIC in and for
22 the State of California,
23 residing at _____ .
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INTERROGATORIES - GEORGE DREXLER

1. State the complete name and address of every business entity in which you were an officer, shareholder, partner or employee during calendar year from 1980 to the present.

ANSWER:

2. State the exact nature of your relationship to Drexler Enterprises, Inc. during calendar year 1980.

ANSWER:

3. State the exact nature of your relationship to Arrcom Inc. during calendar year 1980 to the present.

ANSWER:

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11 4. Give the names and addresses of all corporate officers of Drexler Enterprises Inc. from 1980 to the present.

12 ANSWER:
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22 5. Give the names and addresses of all corporate officers of Arrcom Inc. from 1980 to the present.

23 ANSWER:
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6 6. State the exact nature of your property interest to the property
7 located at Rt. 3, Box 258-A6, Kootenai County, Idaho, otherwise known as
8 the "Rathdrum" property.

9 A. Describe any written documentation, of any kind, which memorializes
10 the arrangement you had with respect to the Rathdrum property.

11 B. Describe where any such written agreement is currently located.

12 ANSWER:
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19 7. Do you currently maintain a property interest of any kind whatsoever
20 at the Rathdrum, Idaho facility?

21 ANSWER:
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4 8. Describe the activities which you, or any of the business entities
5 with which you were affiliated, performed at the Rathdrum, Idaho facility.

6 ANSWER:
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15 9. Did you, or any business entity with which you were affiliated, at
16 any time, treat, store, or dispose any substances listed by EPA as a
17 hazardous waste, at the Rathdrum, Idaho facility?

18 A. If so, identify each such hazardous waste.

19 ANSWER:
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1 10. Please describe the exact nature of your relationship to Warren Bingham.

2 A. Describe any written documentation, of any kind, which memorializes
3 the relationship you had with Warren Bingham.

4 B. Describe where any such written agreement is currently located.

5 ANSWER:
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14 11. State the exact nature of your relationship to Alan Pickett, also known
15 as W.A. Pickett, during calendar years 1980 and 1981 and provide Mr. Pickett's
current address.

16 ANSWER:
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26 12. Was Mr. Pickett ever an employee of Drexler Enterprises Inc. or Arrcom
27 Inc? If so, state the dates of his employment, and the capacity in which he
was employed.

1 ANSWER:
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10 13. Did Drexler Enterprises, Inc. or Arrcom Inc. ever apply for interim
11 status as a RCRA facility for the purpose of treating, storing or disposing
12 of hazardous wastes at the facility at Rathdrum, Idaho?

13 A. If so, did you direct and/or concur that such application be made?
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15 ANSWER:
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23 14. Did Drexler Enterprises, Inc. or Arrcom Inc., or any of its employees,
24 ever transport hazardous waste to the facility at Rathdrum, Idaho?

25 ANSWER:
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6 15. Did you ever have communication with EPA regarding Resource Con-
7 servation and Recovery Act (RCRA) requirements for hazardous waste facilities
8 for the Rathdrum, Idaho facility? If yes, state the dates and names of
individuals and substance of any such communication.

9 ANSWER:
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18 16. Describe the relationship of Arrcom, Inc. to Drexler Enterprises Inc.

19 ANSWER:
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1 17. Describe the business activities of Arrcom, Inc. and Drexler Enterprises,
2 Inc., and indicate any difference in activity and why such difference exists.

3 ANSWER:
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12 18. Describe your relationship to the facility located at 1930 C Street,
13 Tacoma, Washington (hereinafter "C" Street facility).

14 ANSWER:
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23 19. Describe the nature of your business activities, either personally
24 or as officer or employee of any corporation, at the "C" Street facility
during calendar years 1980 to the present.

25 ANSWER:
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6 20. State the specific reason why on December 15, 1981 Arrcom Inc. applied
7 to EPA for a permit to treat, store or dispose of hazardous waste at the
8 "C" Street facility.

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19 ANSWER:

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28 21. Describe the exact nature of the hazardous wastes stored, treated or
disposed of at the "C" Street facility.

ANSWER:

1 22. Describe your relationship to James Cleves Ivers.

2 ANSWER:

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11 23. Did you ever have communication with EPA regarding RCRA requirements for
12 hazardous waste facilities for the "C" Street facility in Tacoma, Washington?
13 If yes, state the dates and names of individuals and the substance of any
such communication.

14 ANSWER:

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23 24. State specifically why you believe that a sample taken from an oil
24 storage tank on June 9, 1982 from the "C" Street facility revealed the
25 presence of substances listed as hazardous wastes.

26 ANSWER:

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28 GEORGE DREXLER INTERROGATORIES - Page 10 of 12 pages

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7 25. State the names of individuals, corporations or other business entities
8 who are currently operating the facility at "C" Street.

9 ANSWER:
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18 26. Give the exact date your business activities at the "C" Street
19 facility, personally or in any other capacity, ceased.

20 ANSWER:
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1 27. State the names and addresses of the individuals or business
2 entities to whom you transferred either ownership or operations at the
"C" Street facility.

3 ANSWER:
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